

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA, NORTHERN DIVISION**

**SCOTT D. LAWSON and  
STEVEN LAWSON,**

**PLAINTIFFS,**


**VS**

**SWIFT TRANSPORTATION  
CORPORATION, INC. and  
FREDRICK S. MARTIN, JR.,**


**DEFENDANTS.**












**CV 2:07cv356-MHT**

## JURY DEMAND

## **PLAINTIFFS' INITIAL DISCLOSURES**

COME NOW the Plaintiffs, by and through their attorneys of record, and provide the initial disclosures pursuant to Rule 26 of the Federal Rules of Civil Procedure and the Court's standing order.

**1. A. Individuals likely to have discoverable information:**

Scott D. Lawson  
19140 Mims Lane  
Andalusia, Alabama 36420

Steven Lawson  
21123 Loop Road  
Andalusia, Alabama 36420

Fredrick S. Martin, Jr.  
533 East 20<sup>th</sup> Street  
Cookeville, Tennessee 38501

Steven F. McGowin  
Investigating Officer  
c/o Andalusia Police Department

Corporate Representative(s) for Swift Transportation

Custodian of Records-  
Injuries and treatment of Plaintiff Scott Lawson  
Roger Boyington, M.D.  
Attention: Patient Release of Information  
135 Medical Park Drive  
Suite 1A  
Andalusia, Alabama 36420

Custodian of Records-  
Injuries and treatment of Plaintiff Steven Lawson  
Gilbert Holland, M.D.  
Attention: Patient Release of Information  
848 South Three Notch Street  
Andalusia, Alabama 36420

Custodian of Records-  
Injuries and treatment of Plaintiffs Scott Lawson and Steven Lawson  
Andalusia Regional Hospital  
Attention: Patient Release of Information  
Post Office Box 760  
Andalusia, Alabama 36420

Possibly other witnesses, who are unknown at this time.

**B. Documents and tangible things which may be used to support claims:**

Plaintiffs will produce a copy of the medical records and billing statements for the Plaintiffs.

Plaintiffs will provide a copy of the accident report prepared by the Hamilton Police Department, if the Defendants do not already have a copy.

**C. Computation of damages claimed by Plaintiffs:**

The precise computation of the damages suffered by Plaintiffs is uncertain at this time. Plaintiffs will supplement as discovery is ongoing.

**D. Insurance Agreement:**

Not applicable.

Respectfully submitted,

s/R. Matt Glover (ASB-7828-A43G)

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s/Stacy Bryan Brooks(ASB-9087-C66B)

**Jones & Jones, P.C.**

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Andalusia, Alabama 36420

(334) 222-3161

(334) 222-3163 facsimile

[joneslaw@andycable.com](mailto:joneslaw@andycable.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Done this the 1st day of July, 2007.

s/R. Matt Glover  
Of Counsel

Lea Richmond, IV, Esquire